

REMARKS

Claims 1 and 3-17 are pending. Claim 1 and 3-5 have been amended. Claims 6-17 have been added. Claim 2 has been cancelled. Applicants reserve the right to pursue the original and other claims in this and any other application.

The specification has been amended to relocate a heading. No new matter has been added.

The drawings stand objected to as being inconsistent with the specification and the specification stands objected to as being inconsistent with the drawings. The assignee of this application filed another U.S. Patent Application No. 10/660,747 ("the '747 application") on the same day as this application. Through inadvertence, the drawings of the '747 application were swapped with the drawings of this application. Applicants respectfully request that the drawings filed with the '747 application, copies of which are submitted herewith, be substituted for the drawings previously filed with this application. These replacement drawings correspond to the written description in the specification and, therefore, do not constitute entry of new matter. Upon entry of the proper drawings, the objection to the drawings and the specification should be withdrawn.

Claim 4 stands rejected under 35 U.S.C. § 112, second paragraph, for failing to further limit the underlying base claim. Claim 4 has been amended and Applicants respectfully submit claim 4 is now in compliance with 35 U.S.C. § 112, second paragraph. Therefore, the rejection of claim 4 should be withdrawn and the claim allowed.

Claims 1-5 stand rejected under 35 U.S.C. 102(b) as being anticipated by S. Kahn et al., Human Tracking in Multiple Cameras (Computer Vision, 2001 ICCV 2001.937537) ("Kahn"). The rejection is respectfully traversed.

Claim 1 recites a “method for creating a novel viewpoint image from a plurality of images.” The method comprises, in part, “construct[ing] a novel viewpoint image by warping at least one of the images, wherein the novel viewpoint image corresponds to a view from a location different than a camera location.”

By contrast, Kahn discloses a method for tracking people as they move across camera views by “finding the limits of field of view (FOV) of a camera as visible in the other cameras.” (Abstract) Kahn does not “construct a novel viewpoint image by warping at least one of the images,” as claimed by Applicants, but rather determines correspondences among existing camera views. Indeed, Kahn is directed at a different problem and does not teach or suggest a solution to the problem solved by Applicants’ claimed invention. Therefore, the rejection of claim 1 should be withdrawn and the claims allowed.


Claims 3-5 depend from claim 1 and are allowable along with claim 1 for at least the reasons stated above with respect to claim 1 and on their own merits. Therefore, the rejection of claims 3-5 should be withdrawn and the claims allowed.

New claims 6-17 are allowable over Kahn for at least the reasons stated above with respect to claim 1. In addition, Applicants respectfully submit that Kahn fails to teach or suggest many other limitations of the claims. For example, claim 6 recites, in part, “acquiring a pair of background images ... generating a background correspondence field based on the background images ... [and] detecting movable objects in the real-time images based at least in part on the background correspondence field.” Kahn, by contrast, fails to teach or suggest “generating a background correspondence field” and instead teaches using only images *already containing movable objects* to determine correspondences, more specifically, to determine field of view lines among a plurality of cameras. (Page 4, Column 2) Thus, Kahn teaches away from Applicants’ claimed invention and, in doing so, fails to achieve the efficient detection of movable objects provided by Applicants’ claimed invention.

In view of the above amendment, Applicants believe the pending application is in condition for allowance and respectfully requests that it be passed to issue.

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Respectfully submitted,

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